

March 26, 2025

Hon. Andrew Carter United States District Judge 40 Foley Square New York, NY 10007

Re: Hacksaw v. Strumpf, No. 24 Civ. 8397 (ALC)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#:

DATE FILED: 03/26/2025

Dear Judge Carter:

We write on behalf of Plaintiffs David Hackshaw, Jr. and Manuel Cuevas to request a one-month extension of the deadline to submit an application for attorneys' fees and costs pursuant to Fed R. Civ. P. 54(d), from April 1 to May 1, 2025.

Last week, the Court entered Judgments pursuant to accepted Offers of Judgment under Fed. R. Civ. P. 68. ECF Nos. 14, 15. Those judgments included "reasonable attorneys' fees and taxable costs as determined by the Court, incurred up through the date of this offer." *Id.* Plaintiffs now seek a one-month extension to see whether it will be possible to resolve their claim for attorneys' fees and costs without motion practice.

This is Plaintiffs' first request for an extension. Defendant consents to this request.

Respectfully submitted,

/s/ Jessica Ranucci
Jessica Ranucci
Counsel for Plaintiff

HON. ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

March 26, 2025 New York, NY